

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL No. 2804

This document relates to:

Case No. 17-md-2804

All Cases

Judge Dan Aaron Polster

**Joint Motion to Continue Deadlines for Submitting a Proposed Protective Order,
Document Production Protocol, Fact Sheets, and Joint Records Collection Order**

The parties hereby request additional time until close of the day on Friday May 4, 2018 to submit the above-captioned documents to the Court which are currently due on April 30, 2018 pursuant to CMO No. 1.

The parties have been in discussions for a number of days with respect to all of these documents. Drafts have been exchanged. However, consensus has not yet been reached. A meeting (in person and by phone) is scheduled with the Special Masters in Washington, D.C. on May 1, 2018 at 11:00 am with the hope that further discussions there will facilitate agreement, or at the least a narrowing of the issues.

DATED: April 30, 2018

Respectfully submitted,

s/Peter H. Weinberger

Peter H. Weinberger (0022076)
SPANGENBERG SHIBLEY & LIBER, LLP
1001 Lakeside Avenue East, Suite 1700
Cleveland, OH 44114
Telephone: (216) 696-3232
Facsimile: (216) 696-3924
pweinberger@spanglaw.com

s/Steven J. Skikos

Steven J. Skikos (148110)
SKIKOS CRAWFORD SKIKOS & JOSEPH, LLP
1 Sansome Street, Ste 2830
San Francisco, CA 94104
Telephone: (415) 546-7300
Fax: (415) 546-7301
sskikos@skikos.com

s/Troy A. Rafferty

Troy A. Rafferty (24120)
LEVIN PAPANTONIO THOMAS MICHELL
RAFFERTY PROCTOR PA
316 South Baylen Street
Pensacola, FL 32502
Telephone: (850) 435-7163
Fax: (850) 436-6163
trafferty@levinlaw.com

Co-liaison Counsel for Plaintiffs

s/Mark S. Cheffo

Mark S. Cheffo
QUINN EMANUEL URQUHART & SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Fax: (212) 849-7100

*Attorneys for Defendants Purdue Pharma L.P.,
Purdue Pharma Inc., and The Purdue Frederick
Company*

Co-Liaison Counsel for the Manufacturer Defendants

s/ Carole S. Rendon

Carole S. Rendon
BAKER & HOSTETLER LLP
Key Tower 127 Public Square, Suite 2000
Cleveland, OH 44114-1214
Telephone: (216) 621- 0200
Fax: (216) 696-0740

*Attorneys for Defendants Endo Health Solutions Inc.
and Endo Pharmaceuticals Inc.*

Co-Liaison Counsel for the Manufacturer Defendants

s/ Enu Mainigi

Enu Mainigi
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W. Washington, DC
20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

*Co-Liaison Counsel for the Distributor
Defendants*

s/ Shannon E. McClure

Shannon E. McClure
REED SMITH LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
smcclure@reedsmith.com

*Attorneys for Distributor Defendant
AmerisourceBergen Drug Corporation*

*Co-liaison Counsel for the Distributor
Defendants*

s/Geoffrey E. Hobart

Geoffrey E. Hobart
COVINGTON & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5281

*Counsel for Distributor Defendant
McKesson Corporation*

s/Kaspar Stoffelmayr

Kaspar Stoffelmayr
BARTLIT BECK HERMAN PALENCHAR & SCOTT llp
54 West Hubbard Street, Ste 300
Chicago, IL 60654
Telephone: (312) 494-4434
Fax: (312) 494-4440
Kaspar.stoffelmayr@bartlit-beck.com

Counsel for the Walgreen Defendants

Co-Liaison Counsel for the Chain Pharmacy Defendants

s/Tyler Tarney

Tyler Tarney (0089082)
GORDON & REES LLP
41 South High Street, Suite 2495
Columbus, OH 43215
Telephone: (614) 917-1953
Fax: (614) 360-2130
ttarney@grsm.com

Liaison Counsel for the Physician Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of April 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

s/Peter H. Weinberger

Peter H. Weinberger

Plaintiffs' Co-Liaison Counsel